

Exhibit 63

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

-----x
COALITION FOR TJ, :
Plaintiff, :
v. : Civil Action No.:
FAIRFAX COUNTY SCHOOL : 1:21-cv-00296-CMH-JFA
BOARD, :
Defendant. :

-----x
Deposition of Coalition for TJ
By and through its Designee
ASRA NOMANI
McLean, Virginia
Monday, October 18, 2021
9:02 a.m.

Job No.: 404859
Pages: 1 - 207
Reported by: Judith E. Bellinger, RPR, CRR

1 spend more time with the work that we were doing
2 with Coalition for TJ.

3 So the members that you have -- see
4 there, Asra Nomani, Suparna Dutta, Srinivas
5 Akella, Glenn Miller, Himanshu Verma, Yuyan Zhou,
6 Helen Miller, Aneel Advani, Marissa Fallon,
7 Hanning Chen, Julia McCaskil, Jun Wang, Harry
8 Jackson, those are the parents who emerged as the
9 ones and self-identified as wanting to take more
10 of a role in leadership in our community
11 organizing.

12 Q What are the responsibilities of the
13 core team?

14 A So --

15 MR. ROPER: Objection to the form.

16 Are you asking about -- you're going to
17 list responsibilities for each person on this
18 list? Or --

19 MS. REWARI: Well, depends on her
20 answer.

21 Q So, does the core team have
22 responsibilities as a core team?

1 our Mailchimp account in September 2020.

2 Q Do you know approximately how many of
3 those newsletters have been sent since
4 September 2020?

5 A Probably -- probably at least a dozen.

6 Q Okay. So Telegram chat, newsletter.
7 Are there any other communications or hallmarks of
8 membership that you provide to people who have
9 been accepted as members?

10 MR. ROPER: Objection to form.

11 A We have our email -- we have emails
12 that go out, just email communications. We've had
13 regular webinars and Zoom meetings that have been
14 public engagement with the community in education.

15 Q Do you have to be a member to attend
16 those?

17 A No. We do keep our events open to the
18 public.

19 Q Okay.

20 A But members get notification.

21 We have had community discussions and
22 debates. We hosted a debate with our gubernatorial

1 candidates and the lieutenant gubernatorial, the
2 lieutenant governor candidate. We have had
3 wonderful education seminars related to the issue
4 of advanced academics.

5 Q And of those events that you just
6 listed, which ones were limited to only members of
7 the Coalition for TJ?

8 A Well, we prided ourselves in making all
9 of our events open to the public. We would have,
10 you know, sometimes limited public advertising of
11 events because, for example, Zoom only allows a
12 certain number of participants. And so we don't
13 want to have such a flight of engagement that we
14 wouldn't be able to accommodate the people who are
15 interested. So sometimes we would just send it to
16 an email list of our members or through our
17 Mailchimp, which would just be our subscribers,
18 instead of on social media channels, for example,
19 which would open it up to more people.

20 Q And members who receive those email
21 invitations can forward it to nonmembers, right?

22 A They can.

1 MR. ROPER: Objection to form.

2 A Those would be two ways.

3 Q Okay. Is there anything else done,
4 within the Coalition for TJ, to record that a
5 person has left the organization?

6 A They could, perhaps, be deleted. We
7 could delete them from the Telegram channel. So
8 we would be able to do that also.

9 Q And has the coalition deleted people
10 from the Telegram channel?

11 A I think in the cases where people have
12 left, they've left and we didn't need to do it.
13 But we could, if we needed to.

14 Q So is the answer to my question, no, no
15 one has been deleted who didn't remove themselves
16 from the Telegram chat?

17 MR. ROPER: Objection to form. Asked
18 and answered.

19 A I was just hesitating because I think
20 in the case of the school board member who had
21 joined, we deleted that person because -- and also
22 in the case of a minor child. You know, we didn't

1 want to create an issue for the child and further
2 communications with the child, so we deleted those
3 individuals.

4 Q In your declaration you mentioned that
5 there were people who have resigned from
6 membership in the Coalition for TJ because of
7 disagreements. Tell me about that.

8 MR. ROPER: Are you pointing to a
9 specific paragraph?

10 Q Well, do you recall talking about that
11 in your declaration?

12 MR. ROPER: You can answer the
13 question.

14 A Yes.

15 Q So do you know what I'm talking about?

16 A Yes.

17 Q Okay. So tell me about that.

18 A Yes. We had a member who believed that
19 we needed to be even more aggressive with Fairfax
20 County Public Schools in litigation and activism,
21 so she left.

22 Q Is that the only person you can think

1 of who has resigned their membership?

2 A No. There was another parent who
3 resigned their membership because she thought we
4 were too aggressive in our position, so she
5 resigned.

6 Q And when those people resigned, did the
7 coalition record those resignations in any way,
8 other than removing them from -- well, actually
9 let me ask that.

10 How did the coalition record that these
11 two individuals had resigned?

12 A So those individuals deleted themselves
13 from the membership.

14 Q And how were you informed that -- of
15 the reasons why they deleted?

16 A They talked to us about it and just
17 discussed it with us.

18 Q Orally or in email? How did they tell
19 you?

20 A I think in both ways. They're friends,
21 parents.

22 Q And were there particular people within

1 United Charitable?

2 A Yeah, we filled out the application
3 form that I mentioned to you. We included in it
4 our mission, our activities, our goals, our, you
5 know, organizational decision-making structure,
6 what we hoped to do in the community.

7 And you can see here, very clearly,
8 that we identified our program activities, conduct
9 original research, journalism and advocacy about
10 significant public issues related to education,
11 contribute to sound public policy decisions and
12 protect gifted and STEM education and the legal
13 defense of the rights of students.

14 Q I think you said "related," but I'm
15 reading relegated to education.

16 A Thank you. Relegated, yeah.

17 Q Okay. Doesn't say anything about TJ
18 admissions in here, right?

19 A It says "protect gifted and STEM
20 education."

21 Q So the mission stated here is different
22 than the mission that's on the website that we

1 looked at, correct?

2 MR. ROPER: Objection to form.

3 A The mission is simply, you know,
4 difference of making it spelled out. What they
5 want to do is they want the program activities
6 spelled out. So what we have on our website is
7 sort of a shortcut to this, sort of. But, really,
8 if you think about it, the diversity in excellence
9 that we're promoting is captured in this mission
10 statement.

11 Q So are you promoting diversity and
12 excellence at any school other than TJ?

13 A Our focus has been at TJ, but we are
14 part of, you know, national efforts to try to
15 protect diversity and excellence in education
16 across the country.

17 Q What do you mean by that?

18 A Other schools are under attack and
19 their admissions policies are also being changed.
20 And so we are supporting that community.

21 Q The Coalition for TJ is supporting that
22 community?

1 MS. REWARI: Objection. Vague.

2 A Yes. All of the members of the core
3 team support the mission of Coalition for TJ to
4 increase diversity and excellence.

5 Q And then under the leadership team,
6 there's that statement that says "Adopts policy
7 decisions by majority vote."

8 Do you see that?

9 A Right.

10 Q And I think you testified that,
11 typically, decisions were made by consensus rather
12 than a formal vote; is that correct?

13 MS. REWARI: Objection. Misstates her
14 testimony.

15 A It is correct that our decisions were
16 made by consensus.

17 Q If there was a need for a formal vote
18 by the leadership team, is that something that
19 could have happened?

20 A Yes. At any point, we could have taken
21 a vote of our membership -- our leadership team
22 and we could still do the same.

1 Q And in your opinion, why does that not
2 usually happen?

3 MS. REWARI: Objection. Calls for a
4 lay opinion.

5 A So we typically don't have a
6 majority -- we don't typically go to take a vote
7 because we respect each other and really want to
8 hear out people's point of view and come to a
9 consensus that the group can fall behind.

10 Q Thank you. You can put Exhibit 3 away.
11 And then if you could take out
12 Exhibit 4. Says "Official Coalition for TJ" at
13 the top.

14 Do you have that in front of you?

15 A I do.

16 Q There are two sections to this
17 document. Up at the top, where it says "Sign up
18 for regular updates"; do you see that?

19 A Yes.

20 Q Tell us, what does it mean if somebody
21 were to sign up -- click on that sign-up link
22 under that top section?

1 A If they were to sign up for regular
2 updates, then they would get our newsletter.

3 Q Would signing up for regular updates
4 make someone a member of the Coalition for TJ?

5 A No, it would not.

6 Q Under that second session, where it
7 says "Contact Us," there's a line that says "Get
8 involved."

9 A Right.

10 Q Do you see that?

11 A Yes.

12 Q So someone would fill out the remainder
13 of that form if they wanted to get involved with
14 the Coalition for TJ; is that correct?

15 A Yes.

16 Q And I believe you testified that by
17 filling out that form and sharing the information
18 there -- well, I guess, tell us, what would be the
19 next step in the process once someone filled out
20 that form?

21 A So, we would have them submit their
22 name, email, and where they heard about us, plus

1 their personal story about why they were
2 advocating for diversity excellence at TJ. And
3 then, also, the question about what programs
4 they're interested in working with. And then it
5 would be reviewed by the members of our membership
6 sub-team to look at, to see if the individual was
7 consistent with our mission. And then send them
8 an invitation to join our Telegram channel, which
9 would then be membership into our organization.

10 Q So if someone, in filling out that
11 form, expressed opposition to the Coalition for
12 TJ's membership -- or to the mission, would they
13 have been admitted as a member of the coalition?

14 A They would -- if somebody expressed
15 opposition to our mission, they would not have
16 been admitted as a member.

17 Q Do the members of the coalition know
18 that they are members?

19 A The members of our coalition know that
20 they're members because we talk about it as, oh,
21 our members, what are our members going to do?
22 And let's get our members to come out here, let's

1 get our members to do this. And so, it's
2 understood in the language of how we communicate.

3 Q Has anyone ever expressed confusion
4 over whether signing up on this website is the way
5 to gain membership in the coalition?

6 A No. In all the time that we have been
7 an organization, we've not received any emails or
8 communication of people confused about how to
9 become a member.

10 Q If someone wanted to become a member of
11 the coalition and they came up to you and told
12 that, what would you tell them?

13 A Yeah, so that has happened a lot in the
14 community. And so I would tell them to go to
15 coalitionfortj.net, not .org or.com, and I would
16 say go and sign up with our contact form.

17 Q And I believe you testified there's no
18 racial criteria considered for admission to become
19 a member of the coalition?

20 A No. We don't have race-based
21 admissions.

22 Q Also, you don't need to be a parent of

1 a TJ student to be a member. I think you
2 testified to that, correct?

3 A Yeah. You do not have to be a parent
4 of a TJ student to be a member.

5 Q But nonetheless, are most of the
6 members of the coalition either parents of TJ
7 students or parents of prospective TJ students?

8 A Yes.

9 MS. REWARI: Objection.

10 A Yes, most of our members are either TJ
11 parents or Fairfax County Public Schools students
12 parents or Loudoun County parents, because Loudoun
13 County is allowed into TJ, along with other
14 regions that feed into TJ.

15 Q Thank you. Turning to another topic.
16 There was some discussion of other schools across
17 the country, other than TJ.

18 Do you recall that --

19 A Yes, I do.

20 Q -- testimony?

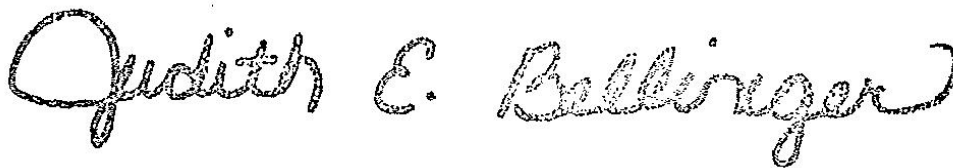
21 Is the Coalition for TJ involved in any
22 lawsuits in other areas of the country?

CERTIFICATE OF REPORTER - NOTARY PUBLIC

I, JUDITH E. BELLINGER, RPR, CRR, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me and thereafter reduced to typewriting under my direction; that reading and signing was not requested; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 5th day of November, 2021.

My Commission Expires: September 30, 2024

A handwritten signature in cursive script that reads "Judith E. Bellinger". The signature is written in dark ink and is positioned above the notary public text.

NOTARY PUBLIC IN AND FOR
THE COMMONWEALTH OF VIRGINIA

Coalition for TJ Core Team

The Coalition for TJ is organized into a core team with sub-teams: the leadership team, membership team, communication/social media team, advocacy team, legal team, and operational management team, data team. The teams include volunteers too.

Core Team

- Members: Asra Nomani, Suparna Dutta, Srinivas Akella, Glenn Miller, Himanshu Verma, Yuyan Zhou, Helen Miller, Aneel Advani, Marissa Fallon, Hanning Chen, Julia Mccaskil, Jun Wang, Harry Jackson

Leadership Team: Adopts policy decisions by majority vote.

- Co-leaders: Asra Nomani, Suparna Dutta, Harry Jackson, Glenn Miller, Helen Miller, Himanshu Verma, Yuyan Zhou

Membership Team*

- Leaders: Hanning, Murali, Vivian, Sowjanya
- The membership team has to carry out the most difficult task to keep the members and volunteers motivated, and it has to actively outreach.
- We need to have zoom meetings with the 180 members of our public Telegram who have not been donating. (Indian community (110-120 members) and the Chinese community (70-80 non-paying members.) It is recommended to host meetings in small batches with 1-2 of the Core Team talking to each batch of 25 members (can use personal zoom to manage this).
- The membership team will require volunteers from the Core Team who can talk to these folks for an hour each and motivate them - to donate, volunteer, or both.

Media and Communications Team

- Leader: Asra
- Members: Suparna (Website), Louise, Marissa

Advocacy Team

- Leader: Helen
- Members: Asra, Louise, Marissa, and Harry

Legal Team

- Leader: Glenn
- Members: Asra, Srinivas

Operational Management Team



- Will manage Core Team meetings, provide operational support to the different committees, and liaise between teams and committees.
- Leader:
- Members: Suparna, Yuyan, Hanning, and Vivian

Data Team

- **Goal:** Analyze the impact of FCPS decisions / options based on publicly available data and data collected via FOIA requests.
- **Members:** Harry, Himanshu, Xi Su, Srinivas, Sudha, James
- Analyze how FCPS has failed URM's in elementary & middle schools.
- Counter the test prep narrative based on real data.
- Research why gifted in NOVA could be a lot more than the rest of the United States.



Official Coalition For TJ

Sign up for regular updates

SIGN UP

CONTACT US

Get involved!

Name

Email*

Where did you hear about us?

Please share your personal story about why the issue of advocating for diversity and excellence is important to you.

COALITION 4
10-18-21
J. BELLINGER
RPR, CRR

What programs are you interested in working with?

SEND

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply

Find more ways to help!

We are parents, students and community members advocating for diversity and excellence at Thomas Jefferson High School for Science and Technology.

[SIGN UP FOR UPDATES](#)

Contact us at CoalitionForTJ@gmail.com

Facebook : [Coalition for Diversity and Excellence at TJ](#)

Twitter : [@CoalitionForTJ](#)

Coalition For TJ

COPYRIGHT © 2020 COALITION FOR TJ - ALL RIGHTS RESERVED.



[Home](#)

[Media](#)

[About Us](#)

[Lottery Predictions](#)

[Solutions](#)

[Privacy Policy](#)

[Terms and Conditions](#)